

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:)
) Case No. 14-34334-beh
) Chapter 13
CASSANDRA TATE &)
CLAUDE DANIELS)
)
Debtors.)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

Please take notice that the debtors, Cassandra Tate and Claude Daniels, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, hereby object to the Motion to Dismiss as brought by Mary B. Grossman, Chapter 13 Trustee.

The debtors assert that her employer was not deducting the correct amount from her paystubs for her chapter 13 payment. The debtor will also forward copies of her 2014 taxes and file a plan modification to account for those refunds.

PLEASE TAKE NOTICE that a telephone hearing will be held before the Honorable Beth E. Hanan, United States Bankruptcy Judge, on January 12 at 9:30 AM, to consider the trustee's motion to dismiss. To appear by telephone, you must call the court conference line at 1-888-808-6929, and enter access code 9122579 before the scheduled hearing time. The court may already be in session, so please wait quietly on the telephone for your case to be called. [If represented by an attorney, the debtor is welcome, but not required, to participate in this hearing. If the debtor is not represented by an attorney, the debtor is required to participate in this hearing.]

Dated: December 11, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtors

/s/

By: Nathan E. DeLadurantey
State Bar No.1063937

Drafted by:
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CLAUDE DANIELS,) Chapter 13
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CERTIFICATE OF SERVICE

Matthew Hoenig states under oath that he is over the age of 18 and a attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on December 11, 2015, he delivered true and correct copies of the attached “Objection to Trustee’s Motion to Dismiss” and “Certificate of Service” via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

I certify under penalty of perjury that the foregoing is true and correct.

Executed on December 11, 2015.

Signed: /s/ Matthew Hoenig
Matthew Hoenig

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